

**Subject:** Orca Critical Habitat

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NOAA's Olympic Coast National Marine Sanctuary appreciates the opportunity to review and provide comments on the proposed Critical Habitat for Southern Resident Killer Whales. We commend NOAA Fisheries for compiling extensive background documents to explain its decision process. Our only substantive comment concerns whether the outer Washington coast should be considered at some level of critical habitat designation in addition to the protected inside waters of Areas 1-3. Records show that southern residents spend at least half of their time away from these core areas and systematic survey efforts and opportunistic sightings by the sanctuary and others have shown them periodically using offshore waters during spring through fall timeframes. We also know that they basically disappear during critical winter foraging times. Thus, although there is insufficient data to determine frequency use of coastal waters, including British Columbia to central California, most of this is a bias of limited survey effort, particularly during the fall/winter. We recommend that if the Washington outer coast is not designated as critical habitat now, then it should be recognized as requiring more intensive monitoring to assess killer whale use patterns for potential add-on later. The Washington coast is already given some protection and recognition as the Olympic Coast National Marine Sanctuary, so it would appear to be a natural extension to include that area now. The Olympic Coast National Marine Sanctuary would be happy to work with NOAA Fisheries and other agencies to help coordinate and leverage each other's research and data collection efforts, thereby minimizing these data gaps. This would be another step in understanding and applying conservation efforts on southern resident killer whales.

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